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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

** All papers shall be filed in the Lead Case.
No. 19-30088 (DM)*

**STIPULATION BETWEEN OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS AND AD HOC COMMITTEE
OF SENIOR UNSECURED
NOTEHOLDERS EXTENDING TIME TO
RESPOND TO MOTION OF THE AD HOC
COMMITTEE OF SENIOR UNSECURED
NOTEHOLDERS TO TERMINATE THE
DEBTORS' EXCLUSIVE PERIODS
PURSUANT TO SECTION 1121(D)(1) OF
THE BANKRUPTCY CODE [DOCKET NO.
2741]**

[No Hearing Requested]

1 This stipulation and agreement for order (the “Stipulation”) is entered into by the
2 (i) Official Committee of Unsecured Creditors (the “UCC”) appointed in the jointly administered
3 chapter 11 cases (the “Chapter 11 Cases”) of the above-captioned debtors in possession, on the
4 one hand; and (ii) Ad Hoc Committee of Senior Unsecured Noteholders (the “Ad Hoc Committee”
5 and together with the UCC, the “Parties”), on the other hand. The Parties hereby stipulate and
6 agree as follows:

7 **RECITALS**

8 A. On June 25, 2019, the Ad Hoc Committee filed the *Motion of the Ad Hoc Committee*
9 *of Senior Unsecured Noteholders to Terminate the Debtors’ Exclusive Periods Pursuant to Section*
10 *1121(d)(1) of the Bankruptcy Code* (the “Motion”) [Docket No. 2741], which is set for hearing
11 before the Court at 9:30 a.m. (Pacific Time) on July 24, 2019. The notice of the Motion indicated
12 that any response or opposition to the Motion is due by 4:00 p.m. (Pacific Time) on July 16, 2019.

13
14 B. Counsel to the UCC has requested, and counsel to the Ad Hoc Committee has
15 agreed, that the time for the UCC to respond to the Motion be extended.

16 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
17 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
18 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH**
19 **THE UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT**
20 **TO ORDER, THAT:**

21 1. The time for the UCC to file and serve any response or opposition to the Motion is
22 extended through 4:00 p.m. (Pacific Time) on July 18, 2019.

23 [Signatures on next page]
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Dated: July 12, 2019

MILBANK LLP

/s/ Thomas R. Kreller
Thomas R. Kreller

*Attorneys for Official Committee of
Unsecured Creditors*

Dated: July 12, 2019

AKIN GUMP STRAUSS HAUER &
FELD LLP

/s/ Ashley Vinson Crawford
Ashley Vinson Crawford

*Ad Hoc Committee of Senior
Unsecured Noteholders*